

# ***WISHA REGIONAL DIRECTIVE***

***Department of Labor and Industries***

***Division of Occupational Safety and Health***

## **20.55                      Log Sorting Yards in Marine Terminals or Sawmills**

**Date Issued: September 18, 2006**

### **I.     Background**

Several industry-specific standards have potential application to log sorting yards attached to marine terminals or sawmills.

Chapter 296-56 WAC applies “to all longshore, stevedore and waterfront operations,” including marine terminals (WAC 296-56-60001(2)). “Marine terminals” include “adjacent storage or contiguous areas” associated with the primary movement of cargo (WAC 296-56-60005).

Chapter 296-78 WAC applies to sawmills and woodworking, including log handling (WAC 296-78-500(1)), while Chapter 296-79 WAC applies to pulp and paper mills, including “all buildings, machinery, and equipment” (WAC 296-79-010).

Finally, Chapter 296-54 WAC applies to logging activities, including log handling, although it excludes “log handling at sawmills, plywood mills, pulp mills or other manufacturing operations governed by specific safety standards.” (WAC 296-54-501). WAC 296-54-593 applies specifically to “dry land sorting and storage.”

The directive has been developed to provide guidance on the appropriate application of these standards to log sorting yards adjacent to marine terminals, including those connected with sawmills, pulp mills, or similar activities.

### **II.    Scope and Application**

This WISHA Regional Directive (WRD), which will remain in effect indefinitely, provides guidance for DOSH enforcement and consultation staff when evaluating dry land log yards, wherever they are located. It replaces all previous guidance on this

subject, whether formal or informal and replaces, but does not substantively change, WRD 20.55, issued May 2, 2001, which is hereby rescinded.

### **III. Interpretive Guidance**

*A. Which standard applies to log sorting operations adjacent to a marine terminal?*

Although such activity falls under the scope of Chapter 296-56 WAC, the most specific applicable requirements are those found in WAC 296-54-593. Therefore, the logging standard governs such activity. After logs have been processed (scaled, graded and sorted) and placed in a “staging area” where the next handling process would put the logs onto a ship, the requirements of WAC 296-56 apply.

*B. Which standard applies when such log sorting operations are directly connected with a sawmill, pulp mill or similar activity?*

Only WAC 296-54-593 provides specific safety standards for log scaling, grading and sorting. Therefore, the logging standard governs such activity until the logs have been processed (scaled, graded and sorted) and placed in a “staging area” where the next handling process would place the logs into a mill (or into a millpond for storage and/or staging). Beyond that point, either Chapter 296-78 WAC or Chapter 296-79 WAC would apply to the activity.

Approved: \_\_\_\_\_  
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